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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JPMORGAN CHASE BANK, N.A.,
Plaintiff,

vs.

TERRAFIRMA VENTURE LLC, a Nevada
limited liability company; AZURE
ESTATES OWNERS ASSOCIATION, a
Nevada non-profit corporation;
ADRIENNE LOVE, an individual,
Defendants.

Case No. 2:17-cv-01928-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND SCHEDULING ORDER
DEADLINES BY 30 DAYS**

(First Request)

Pursuant to LR IA 6-1 and LR 26-4, Plaintiff JPMorgan Chase Bank, N.A. (“Chase”), Defendant Terraforma Venture LLC (“Terraforma”) and Defendant Azure Estates Owners Association (“Azure”), by and through their counsel of record, hereby stipulate and request that this Court extend discovery and dispositive motion deadlines in the above-captioned case for 30 days, to permit the parties to complete written discovery and party depositions. The parties have conferred and agree that this brief extension is the most reasonable given the Chapter 7 bankruptcy filing of nominal Defendant Adrienne Love. *See* Notice of Bankruptcy Filing, at ECF No. 25. A Motion for Relief from Automatic Stay is pending before the United States Bankruptcy Court for the Central District of California.

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1 This is the parties' first request for an extension to the discovery deadlines,
2 which were submitted in compliance with LR 26-1. The parties make this request in
3 good faith and not for purposes of delay.

4 **I. Discovery Completed to Date**

5 To date, Chase has served initial disclosures. No other discovery has been
6 served.

7 **II. Discovery that Remains to be Completed**

8 Due to Ms. Love's Chapter 7 Bankruptcy filing, extensive discovery remains to
9 be completed.

10 **III. Good Cause Exists for the Requested Extension**

11 Good cause exists for the requested extension, as it will provide time for the
12 parties to exchange expert witness information, and complete written discovery and
13 schedule depositions. To date, Chase has served initial disclosures. On November 7,
14 2017, a Notice of Bankruptcy filing was filed at ECF No. 25 regarding nominal
15 defendant Adrienne Love's Chapter 7 bankruptcy pending in the United States
16 Bankruptcy Court for the Central District of California. A Motion for Relief from
17 Automatic Stay is currently pending, and scheduled to be heard on December 14,
18 2017. Accordingly, the parties desire to extend the Scheduling Order deadlines by 30
19 days pending the determination of the Motion for Relief from Automatic Stay.

20 Finally, this is the parties' first request to extend the standard, 180-day
21 discovery period in this case, and they seek only a brief 30-day extension. The
22 parties seek this extension in good faith.

23 **IV. Proposed Deadlines**

24 The parties request an order extending the exchange of expert information, the
25 interim status report, the close of discovery, the deadline to file dispositive motions,
26 and the deadline to file a pre-trial order by 30 days.

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Event	Current Deadline ¹	New Deadline
Exchange of experts and expert reports	December 7, 2017	January 8, 2018
Interim Status Report	December 7, 2017	January 8, 2018
Exchange of rebuttal experts and reports	January 8, 2018	February 7, 2018
Close of Discovery	February 5, 2018	March 7, 2018
Dispositive Motions	March 7, 2018	April 6, 2018
Pre-Trial Order ²	April 6, 2018	May 7, 2018

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¹ See Scheduling Order, ECF No. 19.

² Pursuant to the Scheduling Order, at ECF No. 19, if dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after the decision on the last such dispositive motion or further order of the Court.

This extension is reasonable and necessary given the good cause set forth above.

IT IS SO STIPULATED.

Dated: November 16, 2017

BALLARD SPAHR LLP

By: /s/ Stacy H. Rubin

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Dated: November 16, 2017

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ORDER

IT IS SO ORDERED.



U.S. ~~DISTRICT~~ MAGISTRATE JUDGE

DATED: November 17, 2017